



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

URGENT LEGAL MATTER - PROMPT REPLY NECESSARY
CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 28, 2000

Lucas Western, Inc.
c/o Christian Voltz, Esq.
McKenna & Cuneo, LLP
One Market Plaza
San Francisco, CA 94105-1475

Re: Special Notice Letter for the Puente Valley Operable Unit
of the San Gabriel Valley Superfund Sites, Los Angeles County, California
For property located at 14724 E. Proctor Avenue, Industry, CA

Dear Mr. Voltz:

The United States Environmental Protection Agency ("EPA") considers your company to be potentially responsible for costs incurred in connection with contamination at the Puente Valley Operable Unit of the San Gabriel Valley Superfund Sites (the "Site") in Los Angeles County, California and requests that your company participate in upcoming negotiations to conduct the remedial design and remedial action for the Site. You were previously notified by letter that EPA considers your company to be a Potentially Responsible Party ("PRP") for the Site due to the release or threatened release of hazardous substances. Under Section 107(a) of the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), 42 U.S.C. § 9607, responsible parties are liable for the cleanup of the Site, including all costs incurred by the government in responding to releases at the Site.

The negotiation period initiated by this letter is intended to allow EPA and the PRPs to develop a plan for implementation of the remedial design and remedial action ("RD/RA") for the Site. Sections 106(a) and 107(a) of CERCLA, 42 U.S.C. §§ 9606(a) and 9607(a), require responsible parties to undertake or finance certain actions to protect public health, welfare, or the environment from Superfund site hazards. Responsible parties are also liable for government costs incurred in responding to the release or threatened release of a hazardous substance at a Superfund site. This letter also formally demands reimbursement of unpaid costs that have been incurred, and are expected to be incurred, by the United States at the Site.

Site Information

Groundwater throughout much of the Puente Valley Operable Unit is contaminated with chlorinated solvents, including tetrachloroethene ("PCE") and trichloroethene ("TCE"), which were released into the environment by industrial operations in and around the City of Industry. In May 1993, EPA sent Special Notice letters to 58 PRPs, requesting that they present a good